

Message

From: Hobel, Lawrence [Lhobel@cov.com]
Sent: 6/25/2015 8:44:05 PM
To: Bradfish, Larry [Bradfish.Larry@epa.gov]
CC: Conley, Chris (chris.conley@Rocket.com) [chris.conley@Rocket.com]; Goulart, Scott [scott.goulart@Rocket.com]; Fennessy, Christopher (christopher.fennessy@Rocket.com) [christopher.fennessy@Rocket.com]; Santiago-Ocasio, Carmen [Santiago-Ocasio.Carmen@epa.gov]; Mayer, Kevin [Mayer.Kevin@epa.gov]
Subject: Request for Meeting

Dear Larry:

This email follows up our conversation. Chris Conley has requested that I reach out to you to request a meeting with Region IX Superfund management relative to the Aerojet Sacramento Site. Chris Conley, Scott Goulart, Chris Fennessy and I would attend for Aerojet Rocketdyne. We would anticipate that John Lyons, Caleb Shaffer, Kevin Mayer, Julie Santiago-Ocasio and you would attend for EPA, but do not mean to limit invitees.

EPA will soon issue a ROD for the Boundary Operable Unit. There will then be 3 RODs associated with the Sacramento Site (Western Groundwater, Perimeter Groundwater and Boundary). EPA has proposed that Aerojet Rocketdyne consider a consent administrative order or consent decree for oversight costs to support oversight of remedial action. Meanwhile, work is ongoing as to other operable units, Aerojet Rocketdyne has discussed the need for accelerated actions for Area 40 and there have been programmatic discussions about the potential for early action at other locations. We look forward to whatever agenda items EPA wants to include. We anticipate wanting to discuss:

1. Overall Program management

- alternatives to current review and approval process to ROD
 - It is taking too long: (E.g., Boundary Operable - data collected in 2004/5, FS completed in 2011, Proposed Plan May 2013, ROD not yet issued)
 - approaches to streamline process

2. Oversight of Remedial Actions

- approach to five year review scheduled for 2016
- role of EPA and State in oversight of remedy actions (long term O&M)

3. Rationalizing PCD and an Oversight order/decreed relating to Remedy

- Process to modify the PCD to avoid confusion and duplication (e.g., clarifying that obligations under Exhibits IV and V are superseded)
- how the Agencies will keep track of oversight costs under the PCD and multiple UAOs and future RODs and orders.

4. Area 40 Related Issues and City of Folsom

- Roadways and Utilities: City of Folsom's Infrastructure Plan requires consultation and, as needed, approval of the EPA and State Agencies and Aerojet Rocketdyne respecting roadways, sediment basins, and utilities that are on or near Area 40, including alignments and design.
 - Prompt EPA/State approval of siting and design activities associated with infrastructure, including Roadway and utilities that transect Area 40. Aerojet Rocketdyne is not putting in the infrastructure.
 - other approvals required before Area 40 ROD
 - PCD Paragraph 11 process potentially can be utilized

- Area 40 ROD
 - Property principally for City of Folsom Park and open space
 - City's strongly interest in location of Park and Agency approvals/action necessary for Park on a timely basis
 - Area 40 requires remedy selection on accelerated basis. Area 40 is now within Island Operable Unit, which is on a slower schedule. Area 40 specific RI/FS documents are being submitted with FS in September 2015.

5. Modifications to Program Plan -- Groundwater Related Actions

- Current program plan evaluates groundwater mass removal actions through multiple operable units.
- if current process followed, groundwater mass removal actions likely would await RODs for each operable unit
- Potential for modification to program plan to focus on groundwater remedy internal to the Aerojet Operating facility on a more facility wide basis.
- potential for early soil actions at various sites

Best regards,
Larry

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